

Message

From: Pruzinsky, Amanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31594A2FAC1E4D529B56148007541368-APRUZINS]
Sent: 12/9/2019 10:33:11 PM
To: Bloom, Krystal [krbloom@pa.gov]; Abramovitz, Aryel [abramovitz.aryel@epa.gov]
CC: Kachonik, Robert [rkachonik@pa.gov]
Subject: RE: eRule Readiness Dashboard - Unresolved DMRs
Attachments: NPDES DMR Non-Receipt Status Search Results - State PA.xlsx

Hi Krystal,

To follow up a little further. I don't know exactly what additional information you're looking for on each facility, but I did pull the attached spreadsheet from the [NPDES DMR Non-Receipt Status Search](#) tool that I mentioned in my last email. I used "PA" as the only search criteria. Then in the excel I filtered down to only individual permits with limits present and compliance tracking on. This brings the total number down to 343, which is around the number the eRule dashboard has. The slight differences could be due to any of the eRule dashboard criteria, for convenience I spelled that out a little below.

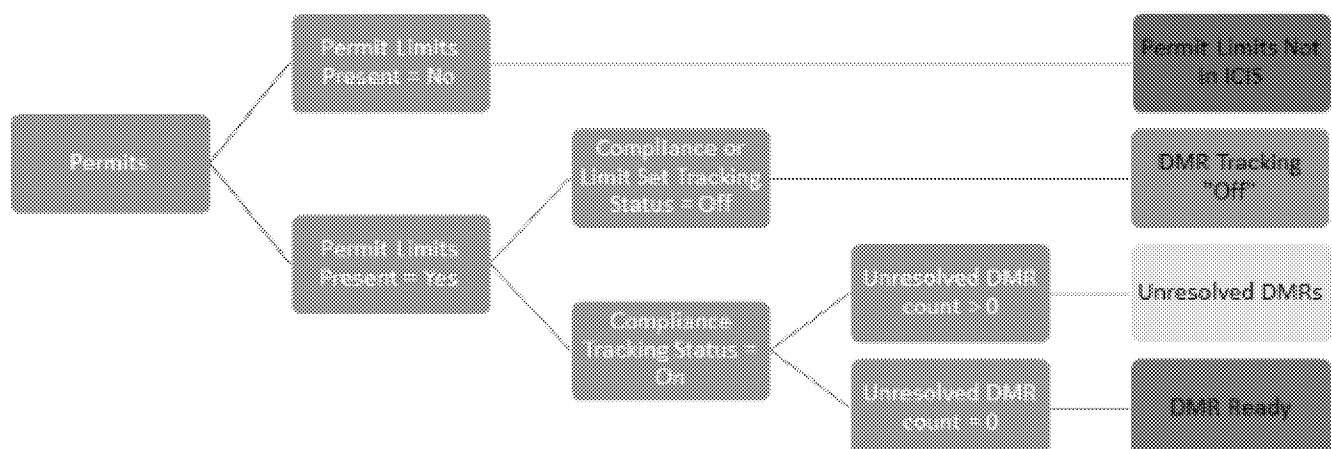
The NPDES DMR Non-Receipt Status Search does provide some additional fields, such as (1) First DMR NR Violation, (2) Most Recent DMR NR Violation, (3) Number of Missing DMR Values (Unresolved), and (4) Number of Missing DMR Forms (Unresolved). I hope that is somewhat helpful. It would be good to know specifically what other fields would help you with this.

The eRule dashboard category for "unresolved DMRs" isn't exactly all of the facilities in ICIS-NPDES with unresolved DMRs. Here are some of the criteria for that dashboard:

- Permit Type: Only facilities with individual NPDES permits are included in the dashboard.
- Permit Status: Only permits with the status of Effective, Administratively Continued, or Expired are included in the dashboard.
- Major/Non-Major Status: Both major and minor (non-major) facilities are included in the dashboard.
- Permit Version: Only the current version of the permit is included in the dashboard.
- Only permits identified as DMR filers (G3A)
- It also uses a hierarchy approach when putting the facilities into the different categories (see graphic below). So the 336 facilities you mentioned first had to meet the criteria of having permit limits present and having compliance tracking "On."

For more information check out the Help page for the eRule Dashboard and "Dashboard Categories."

<https://echo.epa.gov/help/npdes-erule-dashboard/npdes-erule-dashboard-help>



Best,
Amanda

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From: Pruzinsky, Amanda
Sent: Monday, December 09, 2019 4:38 PM
To: Bloom, Krystal <krbloom@pa.gov>; Abramovitz, Aryel <abramovitz.aryel@epa.gov>
Cc: Kachonik, Robert <rkachonik@pa.gov>
Subject: RE: eRule Readiness Dashboard - Unresolved DMRs

Hi Krystal,

Off of the top of my head, there is a tool in place on ECHO that might be able to help you with this called "NPDES DMR Non-Receipt Status Search."

<https://echo.epa.gov/trends/npdes-dmr-non-receipt-status>

I haven't had a moment to dig into the tool myself, so I'm not sure it will be able to answer your specific question. If you check it out and it doesn't help, let us know and we can look into this further.

Best,
Amanda

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From: Bloom, Krystal <krbloom@pa.gov>
Sent: Monday, December 09, 2019 11:48 AM
To: Abramovitz, Aryel <abramovitz.aryel@epa.gov>; Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>
Cc: Kachonik, Robert <rkachonik@pa.gov>
Subject: eRule Readiness Dashboard - Unresolved DMRs

Hi Aryel/Amanda,

I just took a look at our snapshot on the eRule dashboard. Currently it's saying we have 336 facilities with unresolved DMRs. I have pulled a list of those facilities, but it doesn't tell us any detailed information about what's missing, and that's quite an undertaking to go through that many one by one. Is it possible to get detailed information on the missing data? I wasn't sure if this is something David Jacobson could help with or not.

Please let me know, thanks!

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